

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

VIRGINIA E. FORTUNATO, LLC
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Virginia E. Fortunato, Esq. - VEF-0787
Attorney for Debtor, Carlos Bedoya

In Re:

CARLOS BEDOYA,

Debtor.

Case No.: 19-13186

Judge: Vincent F. Papalia

Chapter: 13

CHAPTER 13 ATTORNEY'S CERTIFICATION IN OPPOSITION

The debtor(s), through their counsel, in this case opposes the following **(choose one)**:

1. ☐ Motion for Relief from the Automatic Stay filed by _____ ,
creditor,

A hearing has been scheduled for _____ , at _____ .

- ☐ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for _____ , at _____ .

- ☒ Certification of Default filed by the Chapter 13 Standing Trustee ,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons **(choose one)**:

- ☒ Payments have been made in the amount of \$ 1,280.00 , but have not
been accounted for. Documentation in support is attached.

☐ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

☒ Other (**explain your answer**):

The Debtor advised he made a payment in the amount of \$1,282.00. He is requesting that he be permitted to cure the remaining arrears, in the amount of \$1,726.95, over six months beginning in July 2023. The Debtor can also resume monthly payments in July 2023.

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: June 27, 2023

/s/ Virginia E. Fortunato, Esq.
Attorney for Debtors

NOTES:

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.